

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

Oct 14 2009

In Re:

**EBRO Real Estate Holdings, LLC**

**Debtor.**

) Chapter 11

)

) Case No. 09 B 10104

)

) Judge Eugene R. Wedoff

**EUGENE R. WEDOFF,  
BANKRUPTCY JUDGE**

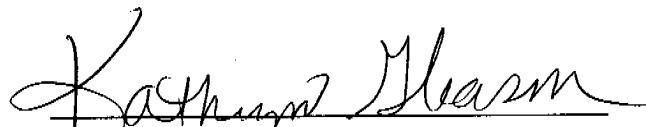
**(To Be Served By Clerk)**

**NOTICE OF HEARING AND MOTION OF UNITED STATES TRUSTEE  
TO CONVERT OR DISMISS CASE**

To the Debtor, its creditors, and other parties in interest:

The United States Trustee for the Northern District of Illinois hereby moves this Court pursuant to Section 1112(b) of the Bankruptcy Code to enter an order converting the above captioned Chapter 11 case to Chapter 7, or, alternatively, dismissing the case, whichever may be in the best interest of creditors and the Estate. The reason(s) for the request are: (1) Pursuant to Section 1112(b)(4)(A), the absence of a reasonable likelihood of rehabilitation in that on September 30, 2009, the Court modified the automatic stay with respect to the real property located at 1330 West 43<sup>rd</sup> Street, Chicago Illinois, the sole asset of the Debtor. The United States Trustee reserves the right to raise other grounds for conversion or dismissal based on any papers filed or testimony taken at or before the hearing on this motion.

PLEASE TAKE NOTICE that a hearing on the United States Trustee's Motion is set for November 18, 2009 at 10:00 am before the Honorable Eugene R. Wedoff in Courtroom 744, Dirksen Federal Courthouse, 219 South Dearborn Street, Chicago, Illinois, at which time you may, but need not appear. This hearing may be continued from time to time without further notice to you other than the announcement in open Court of the continued date.



Kathryn Gleason, Attorney  
OFFICE OF THE UNITED STATES TRUSTEE  
219 S. Dearborn St, Room 873  
Chicago, Illinois 60604  
(312) 886-3327

Dated: October 14, 2009